

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT COURT OF NEW MEXICO

STATE OF NEW MEXICO <i>ex rel.</i>	)	
State Engineer, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	69cv07941-BB/LFG
	)	
v.	)	RIO CHAMA ADJUDICATION
	)	
ROMAN ARAGON, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**UNITED STATES' MOTION FOR EXTENSION OF TIME**  
**TO SUBMIT A CONSENT ORDER**

By Order of February 28, 2012, the Court directed the United States to submit a Consent Order on the United States' federal reserved water right for the Rio Chama Wild and Scenic River by March 2, 2012. Counsel for the United States has since been coordinating with both Department of Justice officials in Washington, DC and with the other parties to the Consent Order. In particular, Counsel has consulted with Counsel for the State regarding the procedures used in this adjudication.

Counsel has been advised that due to the passage of time since the proposed Consent Order was approved by his clients, Mr. Waltz, counsel for the Rio Chama Acequia Association, would like to review the matter again with his clients. Similarly, Department of Justice officials are actively reviewing the proposed Consent Order but have yet to complete that process. Counsel for the United States has been informed that both processes can be completed within two weeks. Accordingly, the United States

respectfully requests that it be allowed to submit the proposed Consent Order by March 16, 2012.

Counsel for the Acequias Nortenas has represented that his clients do not oppose this motion. Counsel for the United States has been unable to reach Counsel for the State or the Rio Chama Acequia Association. Based on prior conversations and e-mails, Counsel believes they also would not oppose this motion.

DATED this 2nd day of March, 2012.

Respectfully Submitted,

Ignacia S. Moreno  
Assistant Attorney General

/s/ David W. Gehlert  
DAVID W. GEHLERT, Trial Attorney  
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Counsel for the United States

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on March 2, 2012, I filed the foregoing  
*UNITED STATES' MOTION FOR EXTENSION OF TIME TO SUBMIT A CONSENT  
ORDER* electronically through the CM/ECF system, which caused parties or counsel to  
be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ David W. Gehlert  
DAVID W. GEHLERT